

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

DONNA K. SOUTTER,
For herself and on behalf of all
Similarly situated individuals,

Plaintiff,

Civil No. 3:10-cv-00514-HEH

v.

TRANS UNION, LLC,

Defendant.

**JOINT STIPULATION REGARDING INJUNCTIVE
AND DECLARATORY RELIEF ALLEGATIONS**

Plaintiff Donna K. Soutter and Defendant Trans Union LLC, through their counsel, and
hereby stipulate to the following:

Paragraph 17 of Plaintiff's First Amended Complaint filed on March 16, 2011 ("First
Amended Complaint"), contains the following allegation:

17. **Injunctive Relief Appropriate for the Class. Fed. R. Civ. P. 23(b)(2).**
Class certification is appropriate, because Defendant has acted on grounds
generally applicable to the class, making appropriate equitable injunctive relief
with respect to Plaintiff and the putative class members.

The prayer of Plaintiff's First Amended Complaint, contains the following prayer for relief:

5. Injunctive and declaratory relief as pled.

Notwithstanding the foregoing allegations, the parties hereby stipulate that neither
Plaintiff nor any of the putative class members are seeking injunctive or declaratory relief in this
matter. The parties further stipulate that paragraph 17 and that part of the prayer seeking
"injunctive and declaratory relief has pled" should be deleted from Plaintiff's First Amended
Complaint.

Date: March 28, 2011.

Respectfully Submitted,

DONNA K. SOUTTER,
For herself and on behalf of all similarly situated
Individuals.

/s/ _____
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TRANS UNION, LLC

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Counsel for Trans Union LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 28 day of March, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

Leonard Anthony Bennett
Consumer Litigation Assoc PC
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Newport News, VA 23606
lenbennett@cox.net
Counsel for Plaintiff

I further certify that I will cause a copy of the foregoing Stipulation and corresponding NEF by electronic mail on the following non-filing user: None

/s/ _____
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